REMARKS

Claims 1-22 are pending in the application. Applicants gratefully acknowledge Examiner's indication that claims 13, 14 and 20 include allowable subject matter and would be allowable if rewritten as suggested on page 8 of the Office Action.

By the above amendment, claims 1-6 are canceled without prejudice as being withdrawn from consideration. 7, 8, 15, 17, 18, 19 and 22 have been amended. New claim 23 has been added, which includes the subject matter of original claims 13 and 7 written in independent form.

Applicants respectfully request reconsideration of the claim rejections based on the above amendments and following remarks.

Elections/Restrictions

The basis for the Restriction Requirement is unclear. The claims are commonly directed to multi-modal browsers. However, the Examiner supports the restriction based on distinctions between dynamic linking and load balancing (see page 2 of the Office Action). Applicants respectfully request that the Examiner revisit the basis for the restriction. In fact, given the common subject matter of the claim groups I and II, Applicants request that Examiner maintain all claims in the current application, as it does not appear that simultaneous examination would present an undue burden on the Examiner.

Claim Rejections – 35 U.S.C. § 112

Claim 17 stands rejected under 35 U.S.C. § 112, second paragraph, for the reasons set forth on page 3 of the Office Action. Although Applicants respectfully disagree with the rejection, claim 17 has been amended to further clarify the claimed subject matter. The claim

term "DOM interface" is clearly described in various sections of Applicants' specification. Moreover, with respect to other claim terms and functions, Applicants respectfully direct the Examiner to review the various WAP multi-modal browser embodiments clearly described throughout Applicants' specification. Withdrawal of the rejection is requested.

Claim Rejections – 35 U.S.C. § 103

Claims 7-10 and 12 stand rejected as being unpatentable over Narin in view of Anupam and further in view of Papierniak, for the reasons set forth on pages 4-5 of the Office Action. Applicants respectfully submit that at the very least, such combination fails to establish a *prima facie* case of obviousness against claim 7.

Indeed, on a fundamental level, none of the cited references is even remotely related to multi-modal browsers as contemplated by the claimed invention, which allow users to interact with a given application in different interaction modalities (e.g., speech and GUI) in a synchronized fashion. For example, Examiner's reliance on Narin as disclosing a plurality of modality-dependent browsers, a multimodal shell and wrapper interfaces is misplaced. In stark contrast, Narin discloses systems and methods for managing client services across Web pages, wherein a service manager is used for managing services and objects called by a browser script (see, Col. 3, line 65-Col. 4, line 40).

By way of specific example, as depicted in FIG. 6A and clearly explained in the corresponding sections of Narin, the service manager (190) operates independently of a browser (180) and can persistently maintains a plurality of service objects (Service 1-5), wherein the lifetime of the service objects are independent of the lifetime of the scripting space (180a). The browser and scripting spaces can interface to the service manager via a connector object (194).

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Based on these clear teachings of Narin, Applicants respectfully submit that there is simply no basis for Examiner's characterization of Narin as set forth in the Office Action. For example, the characterization of the "connector object" as being the claimed multi-modal shell is erroneous, because the "connector object" does not synchronize I/O events across different modality-specific views that are generated by modality-specific browsers, for example.

Moreover, Anupam does not disclose the claimed API for controlling a browser and managing events, as contended on page 4 of the Office Action. Indeed, on a fundamental level, Anupam is not remotely related to multi-modal browser as contemplated by the claimed inventions. In stark contrast, Anupam is directed to methods for generating "smart bookmarks" that comprise stored sequences of browsing steps that are performed by a user and automatically recorded for subsequent playback (Abstract). Although Anupam discloses the "keyword" DOM API, the DOM API is used to install event handlers on individual elements of a downloaded HTML page for purposes of tracking user selections and creating a smart book (see, Col. 5, lines 25, through COL 6, line 2). Anupam does not disclose APIs for controlling modality-specific browsers in a multi-modal browser system, as contemplated by the claimed inventions.

Moreover, reliance on Papierniak is equally misplaced because on a fundamental level, Papierniak is unrelated to the claimed multi-modal browsers. Papierniak discloses methods for presenting different versions of the same information to users based on business functions, privileges, personal preferences, etc., as well as synchronizing multiple web pages between customers, billing agent, managers, etc (see Abstract). However, there is no teaching by Papierniak regarding synchronization of I/O (input/output) events across each modality-specific views that are rendered by the different modality-specific browsers for multi-modal browsing.

Based on the above, it is clear that the combined teachings of <u>Narin, Anupam</u> and <u>Papierniak</u> do not disclose or suggest a multi-modal browser as claimed in claim 7. Thus, claim 7 and all claims that depend from claim 7 are patentable and non-obvious over such combination.

Moreover, since the remaining obviousness rejections (as recited in paragraphs 14, 17, 20 and 24 of the Office Action) are premised, in part, on the combined teachings of <u>Narin, Anupam</u> and <u>Papierniak</u> as applied to claim 7, these rejections are *prima facie* invalid for at least the same reasons given above. Accordingly, withdrawal of the claim rejections under 35 U.S.C. § 103 is respectfully requested.

Respectfully submitted,

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